

## **EXHIBIT 19**

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

Case No.: 3:07-cv-5944-SC  
MDL NO.: 1917

This Document Relates To:

INDIVIDUAL CASE: 3:13-cv-02776-SC

*Sharp Electronics Corp., et al. v. Koninklijke Philips Electronics N.V., et al.*

# **RESPONSE TO KONINKLIJKE PHILIPS N.V.'S FIRST SET OF INTERROGATORIES TO SHARP ELECTRONICS CORPORATION AND SHARP ELECTRONICS MANUFACTURING COMPANY OF AMERICA, INC.**

1           **PROPOUNDING PARTY:** Defendant Koninklijke Philips N.V.

2           **RESPONDING PARTIES:** Plaintiffs Sharp Electronics Corporation and Sharp Electronics  
3           Manufacturing Company of America, Inc.

4           **SET NO:** One

5           Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure and Rule 33.1  
6           of the Local Rules of the Northern District of California, Plaintiff Sharp Electronics Corporation  
7           ("SEC") and Sharp Electronics Manufacturing Company of America, Inc. ("SEMA")  
8           (collectively, "Sharp") hereby respond to Defendant Koninklijke Philips N.V.'s ("KPNV") First  
9           Set of Interrogatories, dated July 21, 2014 (the "Interrogatories") as follows:

10           **GENERAL OBJECTIONS**

11           The following general objections ("General Objections") are incorporated in  
12           Sharp's responses ("Responses") to each and every interrogatory contained in the Interrogatories.  
13           No Response to any interrogatory shall be deemed a waiver of Sharp's General Objections.

14           1. Sharp objects to the Interrogatories and the instructions therein to the extent that they seek  
15           to impose obligations on Sharp beyond those imposed by the Federal Rules of Civil Procedure,  
16           the Local Civil Rules of the Northern District of California, or any applicable order of the Court.

17           2. Sharp objects to the Interrogatories on the grounds that they are improperly being used as  
18           a discovery device, are oppressive, unduly burdensome and violate the rule of proportionality  
19           embodied in Federal Rule of Civil Procedure 26(b)(2)(C).

20           3. Sharp objects to the Interrogatories to the extent that they seek or call for information that  
21           can equally or more readily, conveniently, and in a less burdensome fashion be obtained by  
22           Defendants from public sources.

23           4. Sharp objects to the Interrogatories to the extent that they seek or call for information that  
24           can equally or more readily, conveniently, and in a less burdensome fashion be obtained by  
25           Defendants from others.

26           5. Sharp objects to the Interrogatories to the extent that they seek information that is neither  
27           relevant to this litigation, nor reasonably calculated to lead to the discovery of admissible  
28           evidence. Further, these Responses and Objections are without prejudice to, and not a waiver of,

1 Sharp's right to contend at trial or otherwise in this action that such information is irrelevant,  
2 immaterial, inadmissible, or not a proper basis for discovery, nor any objection by Sharp to any  
3 future use of such information.

4 6. Sharp objects to the Interrogatories to the extent that they are unintelligible, vague,  
5 ambiguous, overly broad, unduly burdensome, and oppressive.

6 7. Sharp objects to the Interrogatories to the extent that they seek or call for information not  
7 in Sharp's possession, custody, or control.

8 8. Documents produced by Sharp in this litigation shall be deemed produced in response to  
9 these Interrogatories, subject to the Responses and Objections contained herein. The burden of  
10 identifying specific information or documents responsive to these Interrogatories from documents  
11 produced in the course of this litigation is substantially the same for either party, and Sharp is  
12 entitled to elect the option to produce business records pursuant to Rule 33(d) of the Federal  
13 Rules of Civil Procedure.

14 9. Sharp objects to the Interrogatories to the extent that they seek or call for information or  
15 documents protected from disclosure by the attorney-client privilege, the attorney work product  
16 doctrine, or any other privilege, protection, or immunity applicable under the governing law. Any  
17 information disclosed pursuant to the Interrogatories will be disclosed without waiving, but on the  
18 contrary reserving and intending to reserve, each of these privileges, protections, or immunities.  
19 Any accidental disclosure of privileged information or material shall not be deemed a waiver of  
20 the applicable privilege, protection, or immunity.

21 10. Sharp objects to the Interrogatories to the extent that they are duplicative and/or  
22 cumulative, either internally of themselves or of discovery previously propounded to Sharp by  
23 other defendants in this matter. Each such Interrogatory violates Section XV, subsections D and  
24 E, of the Court's "Order Re Discovery and Case Management Protocol," entered on April 3,  
25 2012. Order Re: Discovery and Case Management Protocol, *In re Cathode Ray Tube Antitrust*  
26 *Litigation*, Case No. 07-cv-05944-SC, MDL No. 1917 (N.D. Cal. Apr. 3, 2012) (MDL Dkt. No.  
27 1128).

28

1       11. Sharp objects to the Interrogatories to the extent they violate orders of the Court or the  
2 Special Master in this case, including the Special Master's Report and Recommendation on the  
3 Defendants' Motion to Compel, dated August 18, 2014.

4       12. Sharp objects to the Interrogatories, including the instructions and definitions, on the  
5 grounds that Sharp will incur substantial expense in complying with them.

6       13. Sharp objects to the Interrogatories to the extent that they prematurely call for expert  
7 testimony and states that Sharp will provide expert disclosures as provided by the Federal Rules  
8 of Civil Procedure and the orders of the Court.

9       14. Sharp objects to the Interrogatories to the extent that they call for speculation or call for a  
10 conclusion on an issue of law.

11      15. Sharp objects to the Interrogatories to the extent they seek information about contentions  
12 or call for all evidence or all information in support of allegations or contentions. Such  
13 Interrogatories are premature; Sharp has not completed its discovery and preparation in this  
14 matter, and its investigation of this case is ongoing. These responses are being made after  
15 reasonable inquiry into the relevant facts, and are based only upon the information and  
16 documentation that is presently known to Sharp. Further investigation and discovery may result  
17 in the identification of additional information or contentions, and Sharp reserves the right to  
18 supplement and modify its responses. Sharp's responses should not be construed to prejudice its  
19 right to conduct further investigation in this case, or to limit Sharp's use of any additional  
20 evidence that may be developed.

21      16. Sharp objects to, and expressly disclaims, any need or intent to prove any facts listed  
22 herein as a prerequisite to proving its claims at trial.

23      17. Sharp reserves its right to try its case as it determines is best at trial. This includes by not  
24 using facts or information stated herein or using facts or information in addition to those stated  
25 herein.

26      18. Sharp's responses will be subject to the Stipulated Protective Order entered in this action  
27 (MDL Dkt. No. 306).

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1       19. Sharp objects to the Interrogatories to the extent they contain any incidental or implied  
2 admission of fact or law. Sharp's responses to all or any part of any Interrogatory should not be  
3 taken as an incidental or implied admission, agreement, or concurrence that: (i) Sharp accepts or  
4 admits an express or implied assumption of fact set forth in or assumed by the Interrogatory; (ii)  
5 Sharp accepts or admits any express or implied assumption of law set forth in or assumed by the  
6 Interrogatory; (iii) Sharp has in its possession, custody or control documents or information  
7 responsive to that Interrogatory; or (iv) documents or information responsive to that Interrogatory  
8 exist.

9       20. Sharp objects to the Interrogatories to the extent that they call for speculation or call for a  
10 conclusion on an issue of law.

11      21. Sharp reserves its right to object to and/or challenge any evidence on grounds of  
12 competency, relevance, materiality, privilege, or admissibility at trial or at any hearing or  
13 proceeding with respect to any admissions sought by the Interrogatories and all answers Plaintiffs  
14 provide in response to these Interrogatories.

15      22. Sharp objects to the extent the Interrogatories misrepresent Sharp's allegations and the  
16 opinions expressed by Sharp's expert(s) in this case.

17      23. Sharp objects to the Interrogatories to the extent that they are compound and/or contain  
18 discrete subparts in violation of Federal Rule of Civil Procedure 33(a)(1).

19      24. Sharp objects to the definition of "All" because the construction of "All" to include "all,  
20 each, any, and every" is vague, ambiguous, and confusing, and likely to create multiple,  
21 contradictory meanings from the same language. Sharp further objects to the definition of "All"  
22 as not reasonably limited in scope or time. Sharp uses "all" according to its ordinary meaning.

23      25. Sharp objects to Definition No. 2 because the construction of "'and' and 'or'" is vague,  
24 ambiguous, and confusing, and likely to create multiple, contradictory meanings from the same  
25 language. Sharp uses "and" and "or" according to their ordinary meanings.

26      26. Sharp objects to the definition of "DOCUMENT(S)" as vague, ambiguous, and  
27 unreasonably broad and, depending upon Defendants' meaning, may call for a legal conclusion.  
28 Sharp also objects to the definition of "DOCUMENTS" to the extent that it calls for documents

1 that are subject to the attorney-client privilege, the work product doctrine, other applicable  
2 privilege, or are not in Sharp's possession, custody or control.

3 27. Sharp objects to the definition of "IDENITFY" because it is overly broad, unduly  
4 burdensome, and oppressive insofar as it requires that Sharp identify and locate numerous  
5 individuals involved in thousands of discrete purchases made over the course of more than 12  
6 years, dating back to 1995. Sharp also objects to the definition of "IDENTIFY" with respect to  
7 identifying persons and identifying events or occurrences to the extent that it calls for information  
8 beyond Sharp's possession, custody or control. Moreover, virtually all of the individuals  
9 responsive to these requests are current or former employees of the KPNV Defendants or their co-  
10 conspirators, and that information is therefore fully known to KPNV or is otherwise discoverable  
11 by less burdensome methods.

12 28. Sharp objects to the definition of "YOU" and "YOUR" as overbroad, vague, and not  
13 reasonably calculated to lead to the discovery of admissible evidence. In responding to the  
14 Interrogatories directed to "YOU" or "YOUR," Sharp will respond for the Plaintiffs SEC and  
15 SEMA and persons acting on their behalf.

16 29. Sharp objects to Definition No. 14 because it is vague, ambiguous, and confusing and  
17 likely to create multiple, contradictory meanings from the same language. Sharp refers to  
18 singular and plural nouns according to their ordinary meanings.

19 30. Sharp objects to Definition No. 15 because it is vague, ambiguous, and confusing and  
20 likely to create multiple, contradictory meanings from the same language. Sharp uses the present  
21 and past tenses according to their ordinary meanings.

22 31. Sharp objects to Instruction No. 1 to the extent that it calls for information that is the  
23 subject of the attorney-client privilege, the work product doctrine, or any other applicable  
24 privilege, or is not in Plaintiffs' possession, custody or control.

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28

- 1 • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set
- 2 of Interrogatories (July 10, 2014); and
- 3 • Philips Electronics North America Corporation's Responses to Direct Action
- 4 Plaintiffs' First Set of Interrogatories (July 10, 2014).

5 **Request No. 6:**

6 Describe in detail and in narrative form (including by Identifying each Document, Person  
7 or other evidentiary source that You rely upon) the factual basis for your allegation that Royal  
8 Philips was an active participant in the alleged conspiracy, as alleged in paragraph 194 of the  
Complaint.

9 **Response to Request No. 6:**

10 Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp  
11 also objects to this Interrogatory to the extent that it calls for information that is already in the  
12 possession, custody, or control of Defendant, or that can equally or more readily, conveniently,  
13 and in a less burdensome fashion be obtained by Defendant. Sharp further objects to this  
14 Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on  
15 Sharp to state its entire case on an incomplete record and review and analyze all information  
16 obtained in discovery thus far at this stage of this litigation. Sharp objects that this Interrogatory  
17 improperly requires Sharp to marshal all evidence in support of its case, including all testimony,  
18 in responses to written discovery, but particularly while discovery is ongoing and in advance of  
19 the applicable deadlines set by the Court for disclosure of pretrial information. Sharp further  
20 objects to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly  
21 burdensome, and oppressive, and on the grounds that it is cumulative and duplicative of other  
22 discovery propounded in this case, and is therefore in violation of the Special Master's Order  
23 Regarding Individual Action Plaintiffs and Case Management (MDL Dkt. No. 1727, May 3,  
24 2010). Sharp additionally objects to the Interrogatory as requiring the attribution of a particular  
25 action to a specific Philips entity when all of the Philips entities named as defendants were owned  
26 and controlled and acted pursuant to the overall strategy and direction of KPNV. Sharp also  
27 objects to this Interrogatory on the grounds that it seeks, in contravention to well-established legal  
28 principles, to dismember the overall conspiracy to focus on its separate parts, instead of looking at

1 it as a whole. *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699  
2 (1962); *Beltz Travel Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir.  
3 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly  
4 liable for the acts of their co-conspirators and the action of any of the conspirators in furtherance  
5 of the conspiracy is, in law, the action of all. *Id.* Sharp further objects to the extent this request  
6 calls for expert testimony. Sharp also objects to the extent that this request calls for information  
7 that is covered by attorney-client privilege or the work product protection. Sharp further states  
8 that it has not completed its discovery and preparation in this matter and that its investigation of  
9 the case is ongoing, and Sharp reserves its right to supplement or amend its response to this  
10 Interrogatory consistent with Federal Rule of Civil Procedure 26(e).

11 Subject to and without waiving the foregoing objections, Sharp states that the response to  
12 this Interrogatory may include the transactional data and documents produced by defendants, co-  
13 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents  
14 responsive to this Interrogatory from review of the documents and data identified in this response  
15 is substantially the same for either Sharp or KPNV. Sharp further states that information  
16 responsive to this Interrogatory is contained in the following, which are incorporated here by  
17 reference:

- 18 • Exhibit A to these Responses;
- 19 • Attachment A to these Responses;
- 20 • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying  
21 materials;
- 22 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying  
23 materials;
- 24 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and  
25 accompanying materials;
- 26 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 27 • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 28 • The European Commission Report on the CRT Conspiracy;

- 1       • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First  
2              Set of Interrogatories, No. 5 (February 10, 2012);  
3       • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to  
4              Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,  
5              2013);  
6       • Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser  
7              Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);  
8       • Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct  
9              Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);  
10      • Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser  
11             Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);  
12      • Koninklijke Philips Electronics N.V. and Philips Electronics North America  
13             Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of  
14             Interrogatories Nos. 4 and 5 (July 18, 2012);  
15      • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set  
16             of Interrogatories (July 10, 2014);  
17      • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First  
18             Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);  
19      • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'  
20             First Set of Interrogatories, Interrogatories Nos. 4 and 5;  
21      • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and  
22             Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second  
23             Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of  
24             Interrogatories (November 2, 2011);  
25      • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and  
26             Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third  
27             Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of  
28             Interrogatories (December 23, 2011);

- 1       • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 2              Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);
- 3       • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 4              Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 5       • Philips Electronics North America Corporation's Responses to Direct Action
- 6              Plaintiffs' First Set of Interrogatories (July 10, 2014);
- 7       • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of
- 8              Interrogatories (May 12, 2010);
- 9       • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
- 10             First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- 11       • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser
- 12             Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- 13       • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories
- 14             (November 25, 2013);
- 15       • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
- 16             Admission (November 25, 2013);
- 17       • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
- 18             Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
- 19             Interrogatories (February 10, 2012);
- 20       • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
- 21             4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- 22       • Sharp's Responses to Thomson SA and Thomson Consumer's First Set of
- 23             Interrogatories, Nos. 2 & 8 (July 10, 2014);
- 24       • Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG
- 25             Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to
- 26             those Responses (July 28, 2014);
- 27       • Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of
- 28             Interrogatories to Sharp (August 4, 2014);

- 1 • Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4,  
2 2014);
- 3 • Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of  
4 Interrogatories to Sharp (August 4, 2014);
- 5 • Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August  
6 4, 2014); and
- 7 • Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp  
8 (August 4, 2014).

9 **Request No. 7:**

10 Describe in detail and in narrative form (including by Identifying each Document, Person  
11 or other evidentiary source that You rely upon) the factual basis for your allegation that Royal  
12 Philips participated in the alleged conspiracy through PEIL, as alleged in paragraph 194 of the  
13 Complaint.

14 **Response to Request No. 7:**

15 Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp  
16 also objects to this Interrogatory to the extent that it calls for information that is already in the  
17 possession, custody, or control of Defendant, or that can equally or more readily, conveniently,  
18 and in a less burdensome fashion be obtained by Defendant. Sharp further objects to this  
19 Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on  
20 Sharp to state its entire case on an incomplete record and review and analyze all information  
21 obtained in discovery thus far at this stage of this litigation. Sharp objects that this Interrogatory  
22 improperly requires Sharp to marshal all evidence in support of its case, including all testimony,  
23 in responses to written discovery, but particularly while discovery is ongoing and in advance of  
24 the applicable deadlines set by the Court for disclosure of pretrial information. Sharp further  
25 objects to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly  
26 burdensome, and oppressive, and on the grounds that it is cumulative and duplicative of other  
27 discovery propounded in this case, and is therefore in violation of the Special Master's Order  
28 Regarding Individual Action Plaintiffs and Case Management (MDL Dkt. No. 1727, May 3,  
2010). Sharp additionally objects to the Interrogatory as requiring the attribution of a particular

1 action to a specific Philips entity when all of the Philips entities named as defendants were owned  
2 and controlled and acted pursuant to the overall strategy and direction of KPNV. Sharp also  
3 objects to this Interrogatory on the grounds that it seeks, in contravention to well-established legal  
4 principles, to dismember the overall conspiracy to focus on its separate parts, instead of looking at  
5 it as a whole. *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699  
6 (1962); *Beltz Travel Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir.  
7 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly  
8 liable for the acts of their co-conspirators and the action of any of the conspirators in furtherance  
9 of the conspiracy is, in law, the action of all. *Id.* Sharp further objects to the extent this request  
10 calls for expert testimony. Sharp also objects to the extent that this request calls for information  
11 that is covered by attorney-client privilege or the work product protection. Sharp further states  
12 that it has not completed its discovery and preparation in this matter and that its investigation of  
13 the case is ongoing, and Sharp reserves its right to supplement or amend its response to this  
14 Interrogatory consistent with Federal Rule of Civil Procedure 26(e).

15 Subject to and without waiving the foregoing objections, Sharp states that the response to  
16 this Interrogatory may include the transactional data and documents produced by defendants, co-  
17 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents  
18 responsive to this Interrogatory from review of the documents and data identified in this response  
19 is substantially the same for either Sharp or KPNV. Sharp further states that information  
20 responsive to this Interrogatory is contained in the following, which are incorporated here by  
21 reference:

- 22 • Exhibit A to these Responses;
- 23 • Attachment A to these Responses;
- 24 • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying  
25 materials;
- 26 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying  
27 materials;

28

- the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and accompanying materials;
- Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- Korean Fair Trade Commission Report on the CRT Conspiracy;
- The European Commission Report on the CRT Conspiracy;
- Hitachi Displays, Ltd.’s Supplemental Response to Direct Purchaser Plaintiffs’ First Set of Interrogatories, No. 5 (February 10, 2012);
- Hitachi Displays, Ltd.’s (n/k/a Japan Display Inc.) Second Supplemental Response to Direct Purchaser Plaintiffs’ First Set of Interrogatories, Interrogatory No. 5 (April 12, 2013);
- Hitachi Electronic Devices (USA), Inc.’s Supplemental Response to Direct Purchaser Plaintiffs’ First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- Hitachi Electronic Devices (USA), Inc.’s Second Supplemental Response to Direct Purchaser Plaintiffs’ First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);
- Koninklijke Philips Electronics N.V.’s Responses and Objections to Direct Purchaser Plaintiffs’ First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- Koninklijke Philips Electronics N.V. and Philips Electronics North America Corporation Responses and Objections to Direct Purchaser Plaintiffs’ First Set of Interrogatories Nos. 4 and 5 (July 18, 2012);
- Koninklijke Philips Electronics N.V.’s Responses to Direct Action Plaintiffs’ First Set of Interrogatories (July 10, 2014);
- LG Electronics, Inc.’s Supplemental Responses to Direct Purchaser Plaintiffs’ First Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);
- LG Electronics, Inc.’s Second Supplemental Responses to Direct Purchaser Plaintiffs’ First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- Panasonic Corporation of North America, MT Picture Display Co., Ltd., and Panasonic Corporation’s (f/k/a Matsushita Electric Industrial Co., Ltd.) Second

1                   Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of  
2                   Interrogatories (November 2, 2011);

- 3                   • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and  
4                   Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third  
5                   Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of  
6                   Interrogatories (December 23, 2011);  
7                   • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of  
8                   Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);  
9                   • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of  
10                  Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);  
11                  • Philips Electronics North America Corporation's Responses to Direct Action  
12                  Plaintiffs' First Set of Interrogatories (July 10, 2014);  
13                  • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of  
14                  Interrogatories (May 12, 2010);  
15                  • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'  
16                  First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);  
17                  • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser  
18                  Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);  
19                  • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories  
20                  (November 25, 2013);  
21                  • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for  
22                  Admission (November 25, 2013);  
23                  • Toshiba America Electronic Components, Inc.'s Supplemental Objections and  
24                  Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of  
25                  Interrogatories (February 10, 2012);  
26                  • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.  
27                  4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);

- 1 • Sharp's Responses to Thomson SA and Thomson Consumer's First Set of
- 2 Interrogatories, Nos. 2 & 8 (July 10, 2014);
- 3 • Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG
- 4 Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to
- 5 those Responses (July 28, 2014);
- 6 • Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of
- 7 Interrogatories to Sharp (August 4, 2014);
- 8 • Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4,
- 9 2014);
- 10 • Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of
- 11 Interrogatories to Sharp (August 4, 2014);
- 12 • Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August
- 13 4, 2014); and,
- 14 • Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp
- 15 (August 4, 2014).

16 **Request No. 8:**

17       Describe in detail and in narrative form (including by Identifying each Document, Person  
18 or other evidentiary source that You rely upon) the factual basis for your allegation that Philips  
19 America participated in the alleged conspiracy through Royal Philips and PEIL, as alleged in  
paragraph 194 of the Complaint.

20 **Response to Request No. 8:**

21       Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp  
22 also objects to this Interrogatory to the extent that it calls for information that is already in the  
23 possession, custody, or control of Defendant, or that can equally or more readily, conveniently,  
24 and in a less burdensome fashion be obtained by Defendant. Sharp further objects to this  
25 Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on  
26 Sharp to state its entire case on an incomplete record and review and analyze all information  
27 obtained in discovery thus far at this stage of this litigation. Sharp objects that this Interrogatory  
28 improperly requires Sharp to marshal all evidence in support of its case, including all testimony,

1 in responses to written discovery, but particularly while discovery is ongoing and in advance of  
2 the applicable deadlines set by the Court for disclosure of pretrial information. Sharp further  
3 objects to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly  
4 burdensome, and oppressive, and on the grounds that it is cumulative and duplicative of other  
5 discovery propounded in this case, and is therefore in violation of the Special Master's Order  
6 Regarding Individual Action Plaintiffs and Case Management (MDL Dkt. No. 1727, May 3,  
7 2010). Sharp additionally objects to the Interrogatory as requiring the attribution of a particular  
8 action to a specific Philips entity when all of the Philips entities named as defendants were owned  
9 and controlled and acted pursuant to the overall strategy and direction of KPNV. Sharp also  
10 objects to this Interrogatory on the grounds that it seeks, in contravention to well-established legal  
11 principles, to dismember the overall conspiracy to focus on its separate parts, instead of looking at  
12 it as a whole. *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699  
13 (1962); *Beltz Travel Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir.  
14 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly  
15 liable for the acts of their co-conspirators and the action of any of the conspirators in furtherance  
16 of the conspiracy is, in law, the action of all. *Id.* Sharp further objects to the extent this request  
17 calls for expert testimony. Sharp also objects to the extent that this request calls for information  
18 that is covered by attorney-client privilege or the work product protection. Sharp further states  
19 that it has not completed its discovery and preparation in this matter and that its investigation of  
20 the case is ongoing, and Sharp reserves its right to supplement or amend its response to this  
21 Interrogatory consistent with Federal Rule of Civil Procedure 26(e).

22 Subject to and without waiving the foregoing objections, Sharp states that the response to  
23 this Interrogatory may include the transactional data and documents produced by defendants, co-  
24 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents  
25 responsive to this Interrogatory from review of the documents and data identified in this response  
26 is substantially the same for either Sharp or KPNV. Sharp further states that information  
27 responsive to this Interrogatory is contained in the following, which are incorporated here by  
28 reference:

- 1       • Exhibit A to these Responses;
- 2       • Attachment A to these Responses;
- 3       • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying  
4                  materials;
- 5       • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying  
6                  materials;
- 7       • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and  
8                  accompanying materials;
- 9       • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 10      • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 11      • The European Commission Report on the CRT Conspiracy;
- 12      • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First  
13                  Set of Interrogatories, No. 5 (February 10, 2012);
- 14      • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to  
15                  Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,  
16                  2013);
- 17      • Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser  
18                  Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- 19      • Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct  
20                  Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);
- 21      • Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser  
22                  Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- 23      • Koninklijke Philips Electronics N.V. and Philips Electronics North America  
24                  Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of  
25                  Interrogatories Nos. 4 and 5 (July 18, 2012);
- 26      • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set  
27                  of Interrogatories (July 10, 2014);

- 1       • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First
- 2              Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);
- 3       • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'
- 4              First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 5       • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
- 6              Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second
- 7              Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 8              Interrogatories (November 2, 2011);
- 9       • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
- 10              Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third
- 11              Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 12              Interrogatories (December 23, 2011);
- 13       • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 14              Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);
- 15       • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 16              Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 17       • Philips Electronics North America Corporation's Responses to Direct Action
- 18              Plaintiffs' First Set of Interrogatories (July 10, 2014);
- 19       • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of
- 20              Interrogatories (May 12, 2010);
- 21       • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
- 22              First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- 23       • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser
- 24              Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- 25       • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories
- 26              (November 25, 2013);
- 27       • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
- 28              Admission (November 25, 2013);

- 1       • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
- 2              Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
- 3              Interrogatories (February 10, 2012);
- 4       • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
- 5              4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- 6       • Sharp's Responses to Thomson SA and Thomson Consumer's First Set of
- 7              Interrogatories, Nos. 2 & 8 (July 10, 2014);
- 8       • Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG
- 9              Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to
- 10             those Responses (July 28, 2014);
- 11       • Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of
- 12              Interrogatories to Sharp (August 4, 2014);
- 13       • Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4,
- 14              2014);
- 15       • Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of
- 16              Interrogatories to Sharp (August 4, 2014);
- 17       • Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August
- 18              4, 2014); and
- 19       • Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp
- 20              (August 4, 2014).

21 **Request No. 9:**

22       Describe in detail and in narrative form (including by Identifying each Document, Person  
23 or other evidentiary source that You rely upon) the factual basis for your allegation that Royal  
24 Philips participated in the alleged conspiracy through LP Displays (f/k/a LGPD), as alleged in  
25 paragraph 194 of the Complaint.

26 **Response to Request No. 9:**

27       Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp  
28 also objects to this Interrogatory to the extent that it calls for information that is already in the  
possession, custody, or control of Defendant, or that can equally or more readily, conveniently,

1 and in a less burdensome fashion be obtained by Defendant. Sharp further objects to this  
2 Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on  
3 Sharp to state its entire case on an incomplete record and review and analyze all information  
4 obtained in discovery thus far at this stage of this litigation. Sharp objects that this Interrogatory  
5 improperly requires Sharp to marshal all evidence in support of its case, including all testimony,  
6 in responses to written discovery, but particularly while discovery is ongoing and in advance of  
7 the applicable deadlines set by the Court for disclosure of pretrial information. Sharp further  
8 objects to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly  
9 burdensome, and oppressive, and on the grounds that it is cumulative and duplicative of other  
10 discovery propounded in this case, and is therefore in violation of the Special Master's Order  
11 Regarding Individual Action Plaintiffs and Case Management (MDL Dkt. No. 1727, May 3,  
12 2010). Sharp additionally objects to the Interrogatory as requiring the attribution of a particular  
13 action to a specific Philips entity when all of the Philips entities named as defendants were owned  
14 and controlled and acted pursuant to the overall strategy and direction of KPNV. Sharp also  
15 objects to this Interrogatory on the grounds that it seeks, in contravention to well-established legal  
16 principles, to dismember the overall conspiracy to focus on its separate parts, instead of looking at  
17 it as a whole. *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699  
18 (1962); *Beltz Travel Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir.  
19 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly  
20 liable for the acts of their co-conspirators and the action of any of the conspirators in furtherance  
21 of the conspiracy is, in law, the action of all. *Id.* Sharp further objects to the extent this request  
22 calls for expert testimony. Sharp also objects to the extent that this request calls for information  
23 that is covered by attorney-client privilege or the work product protection. Sharp further states  
24 that it has not completed its discovery and preparation in this matter and that its investigation of  
25 the case is ongoing, and Sharp reserves its right to supplement or amend its response to this  
26 Interrogatory consistent with Federal Rule of Civil Procedure 26(e).

27 Subject to and without waiving the foregoing objections, Sharp states that the response to  
28 this Interrogatory may include the transactional data and documents produced by defendants, co-

1 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents  
2 responsive to this Interrogatory from review of the documents and data identified in this response  
3 is substantially the same for either Sharp or KPNV. Sharp further states that information  
4 responsive to this Interrogatory is contained in the following, which are incorporated here by  
5 reference:

- 6 • Exhibit A to these Responses;
- 7 • Attachment A to these Responses;
- 8 • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying  
9 materials;
- 10 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying  
11 materials;
- 12 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and  
13 accompanying materials;
- 14 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 15 • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 16 • The European Commission Report on the CRT Conspiracy;
- 17 • Deposition of Roger de Moor (July 31-August 1, 2012);
- 18 • Deposition of Pil Jae Lee (July 16-17, 2013);
- 19 • Deposition of Jim Smith (December 12-13, 2013);
- 20 • Deposition of Wiebo Vaartjes (December 18-19, 2013);
- 21 • Deposition of Patrick Canavan (January 30-31, 2014);
- 22 • Deposition of Robert O'Brien (March 20-21, 2014);
- 23 • Deposition of Joseph Killen (May 15, 2014);
- 24 • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First  
25 Set of Interrogatories, No. 5 (February 10, 2012);
- 26 • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to  
27 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,  
28 2013);

- 1       • Hitachi Electronic Devices (USA), Inc.’s Supplemental Response to Direct Purchaser  
2              Plaintiffs’ First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);  
3       • Hitachi Electronic Devices (USA), Inc.’s Second Supplemental Response to Direct  
4              Purchaser Plaintiffs’ First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);  
5       • Koninklijke Philips Electronics N.V.’s Responses and Objections to Direct Purchaser  
6              Plaintiffs’ First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);  
7       • Koninklijke Philips Electronics N.V. and Philips Electronics North America  
8              Corporation Responses and Objections to Direct Purchaser Plaintiffs’ First Set of  
9              Interrogatories Nos. 4 and 5 (July 18, 2012);  
10      • Koninklijke Philips Electronics N.V.’s Responses to Direct Action Plaintiffs’ First Set  
11             of Interrogatories (July 10, 2014);  
12      • LG Electronics, Inc.’s Supplemental Responses to Direct Purchaser Plaintiffs’ First  
13             Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);  
14      • LG Electronics, Inc.’s Second Supplemental Responses to Direct Purchaser Plaintiffs’  
15             First Set of Interrogatories, Interrogatories Nos. 4 and 5;  
16      • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and  
17              Panasonic Corporation’s (f/k/a Matsushita Electric Industrial Co., Ltd.) Second  
18              Supplemental Responses and Objections to Direct Purchaser Plaintiffs’ First Set of  
19              Interrogatories (November 2, 2011);  
20      • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and  
21              Panasonic Corporation’s (f/k/a Matsushita Electric Industrial Co., Ltd.) Third  
22              Supplemental Responses and Objections to Direct Purchaser Plaintiffs’ First Set of  
23              Interrogatories (December 23, 2011);  
24      • Philips’ Supplemental Responses to Direct Purchaser Plaintiffs’ First Set of  
25              Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);  
26      • Philips’ Second Supplemental Responses to Direct Purchaser Plaintiffs’ First Set of  
27              Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);  
28

- 1       • Philips Electronics North America Corporation's Responses to Direct Action
- 2               Plaintiffs' First Set of Interrogatories (July 10, 2014);
- 3       • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of
- 4               Interrogatories (May 12, 2010);
- 5       • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
- 6               First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- 7       • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser
- 8               Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- 9       • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories
- 10               (November 25, 2013);
- 11       • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
- 12               Admission (November 25, 2013);
- 13       • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
- 14               Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
- 15               Interrogatories (February 10, 2012);
- 16       • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
- 17               4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- 18       • Sharp's Responses to Thomson SA and Thomson Consumer's First Set of
- 19               Interrogatories, Nos. 2 & 8 (July 10, 2014);
- 20       • Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG
- 21               Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to
- 22               those Responses (July 28, 2014);
- 23       • Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of
- 24               Interrogatories to Sharp (August 4, 2014);
- 25       • Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4,
- 26               2014);
- 27       • Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of
- 28               Interrogatories to Sharp (August 4, 2014);

- 1 • Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August  
2 4, 2014); and
- 3 • Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp  
4 (August 4, 2014).

5 **Request No. 10:**

6 Describe in detail and in narrative form (including by Identifying each Document, Person  
7 or other evidentiary source that You rely upon) the factual basis for your allegation that Philips  
8 America participated in the alleged conspiracy through LP Displays (f/k/a LGPD), as alleged in  
9 paragraph 194 of the Complaint.

10 **Response to Request No. 10:**

11 Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp  
12 also objects to this Interrogatory to the extent that it calls for information that is already in the  
13 possession, custody, or control of Defendant, or that can equally or more readily, conveniently,  
14 and in a less burdensome fashion be obtained by Defendant. Sharp further objects to this  
15 Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on  
16 Sharp to state its entire case on an incomplete record and review and analyze all information  
17 obtained in discovery thus far at this stage of this litigation. Sharp objects that this Interrogatory  
18 improperly requires Sharp to marshal all evidence in support of its case, including all testimony,  
19 in responses to written discovery, but particularly while discovery is ongoing and in advance of  
20 the applicable deadlines set by the Court for disclosure of pretrial information. Sharp further  
21 objects to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly  
22 burdensome, and oppressive, and on the grounds that it is cumulative and duplicative of other  
23 discovery propounded in this case, and is therefore in violation of the Special Master's Order  
24 Regarding Individual Action Plaintiffs and Case Management (MDL Dkt. No. 1727, May 3,  
25 2010). Sharp additionally objects to the Interrogatory as requiring the attribution of a particular  
26 action to a specific Philips entity when all of the Philips entities named as defendants were owned  
27 and controlled and acted pursuant to the overall strategy and direction of KPNV. Sharp also  
28 objects to this Interrogatory on the grounds that it seeks, in contravention to well-established legal  
principles, to dismember the overall conspiracy to focus on its separate parts, instead of looking at

1 it as a whole. *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699  
2 (1962); *Beltz Travel Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir.  
3 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly  
4 liable for the acts of their co-conspirators and the action of any of the conspirators in furtherance  
5 of the conspiracy is, in law, the action of all. *Id.* Sharp further objects to the extent this request  
6 calls for expert testimony. Sharp also objects to the extent that this request calls for information  
7 that is covered by attorney-client privilege or the work product protection. Sharp further states  
8 that it has not completed its discovery and preparation in this matter and that its investigation of  
9 the case is ongoing, and Sharp reserves its right to supplement or amend its response to this  
10 Interrogatory consistent with Federal Rule of Civil Procedure 26(e).

11 Subject to and without waiving the foregoing objections, Sharp states that the response to  
12 this Interrogatory may include the transactional data and documents produced by defendants, co-  
13 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents  
14 responsive to this Interrogatory from review of the documents and data identified in this response  
15 is substantially the same for either Sharp or KPNV. Sharp further states that information  
16 responsive to this Interrogatory is contained in the following, which are incorporated here by  
17 reference:

- 18 • Exhibit A to these Responses;
- 19 • Attachment A to these Responses;
- 20 • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying  
21 materials;
- 22 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying  
23 materials;
- 24 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and  
25 accompanying materials;
- 26 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 27 • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 28 • The European Commission Report on the CRT Conspiracy;

- 1       • Deposition of Roger de Moor (July 31 – August 1, 2012);
- 2       • Deposition of Pil Jae Lee (July 16-17, 2013);
- 3       • Deposition of Jim Smith (December 12-13, 2013);
- 4       • Deposition of Wiebo Vaartjes (December 18-19, 2013);
- 5       • Deposition of Patrick Canavan (January 30-31, 2014);
- 6       • Deposition of Robert O'Brien (March 20-21, 2014);
- 7       • Deposition of Joseph Killen (May 15, 2014);
- 8       • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First  
9           Set of Interrogatories, No. 5 (February 10, 2012);
- 10      • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to  
11           Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,  
12           2013);
- 13      • Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser  
14           Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- 15      • Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct  
16           Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);
- 17      • Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser  
18           Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- 19      • Koninklijke Philips Electronics N.V. and Philips Electronics North America  
20           Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of  
21           Interrogatories Nos. 4 and 5 (July 18, 2012);
- 22      • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set  
23           of Interrogatories (July 10, 2014);
- 24      • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First  
25           Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);
- 26      • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'  
27           First Set of Interrogatories, Interrogatories Nos. 4 and 5;

- 1       • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and  
2                   Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second  
3                   Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of  
4                   Interrogatories (November 2, 2011);  
5       • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and  
6                   Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third  
7                   Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of  
8                   Interrogatories (December 23, 2011);  
9       • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of  
10                  Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);  
11       • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of  
12                  Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);  
13       • Philips Electronics North America Corporation's Responses to Direct Action  
14                  Plaintiffs' First Set of Interrogatories (July 10, 2014);  
15       • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of  
16                  Interrogatories (May 12, 2010);  
17       • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'  
18                  First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);  
19       • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser  
20                  Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);  
21       • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories  
22                  (November 25, 2013);  
23       • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for  
24                  Admission (November 25, 2013);  
25       • Toshiba America Electronic Components, Inc.'s Supplemental Objections and  
26                  Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of  
27                  Interrogatories (February 10, 2012);  
28

- 1 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.  
2 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);  
3 • Sharp's Responses to Thomson SA and Thomson Consumer's First Set of  
4 Interrogatories, Nos. 2 & 8 (July 10, 2014);  
5 • Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG  
6 Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to  
7 those Responses (July 28, 2014);  
8 • Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of  
9 Interrogatories to Sharp (August 4, 2014);  
10 • Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4,  
11 2014);  
12 • Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of  
13 Interrogatories to Sharp (August 4, 2014);  
14 • Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August  
15 4, 2014); and  
16 • Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp  
17 (August 4, 2014).

18 **Request No. 11:**

19 Describe in detail and in narrative form (including by Identifying each Document, Person  
20 or other evidentiary source that You rely upon) the factual basis for your allegation that Philips  
21 America was an active, knowing participant in the alleged conspiracy, as alleged in paragraph  
22 195 of the Complaint.

23 **Response to Request No. 11:**

24 Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp  
25 also objects to this Interrogatory to the extent that it calls for information that is already in the  
26 possession, custody, or control of Defendant, or that can equally or more readily, conveniently,  
27 and in a less burdensome fashion be obtained by Defendant. Sharp further objects to this  
28 Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on  
Sharp to state its entire case on an incomplete record and review and analyze all information

1 obtained in discovery thus far at this stage of this litigation. Sharp objects that this Interrogatory  
2 improperly requires Sharp to marshal all evidence in support of its case, including all testimony,  
3 in responses to written discovery, but particularly while discovery is ongoing and in advance of  
4 the applicable deadlines set by the Court for disclosure of pretrial information. Sharp further  
5 objects to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly  
6 burdensome, and oppressive, and on the grounds that it is cumulative and duplicative of other  
7 discovery propounded in this case, and is therefore in violation of the Special Master's Order  
8 Regarding Individual Action Plaintiffs and Case Management (MDL Dkt. No. 1727, May 3,  
9 2010). Sharp additionally objects to the Interrogatory as requiring the attribution of a particular  
10 action to a specific Philips entity when all of the Philips entities named as defendants were owned  
11 and controlled and acted pursuant to the overall strategy and direction of KPNV. Sharp also  
12 objects to this Interrogatory on the grounds that it seeks, in contravention to well-established legal  
13 principles, to dismember the overall conspiracy to focus on its separate parts, instead of looking at  
14 it as a whole. *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699  
15 (1962); *Beltz Travel Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir.  
16 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly  
17 liable for the acts of their co-conspirators and the action of any of the conspirators in furtherance  
18 of the conspiracy is, in law, the action of all. *Id.* Sharp further objects to the extent this request  
19 calls for expert testimony. Sharp also objects to the extent that this request calls for information  
20 that is covered by attorney-client privilege or the work product protection. Sharp further states  
21 that it has not completed its discovery and preparation in this matter and that its investigation of  
22 the case is ongoing, and Sharp reserves its right to supplement or amend its response to this  
23 Interrogatory consistent with Federal Rule of Civil Procedure 26(e).

24 Subject to and without waiving the foregoing objections, Sharp states that the response to  
25 this Interrogatory may include the transactional data and documents produced by defendants, co-  
26 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents  
27 responsive to this Interrogatory from review of the documents and data identified in this response  
28 is substantially the same for either Sharp or KPNV. Sharp further states that information

1 responsive to this Interrogatory is contained in the following, which are incorporated here by  
2 reference:

- 3 • Exhibit A to these Responses;
- 4 • Attachment A to these Responses;
- 5 • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying  
6 materials;
- 7 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying  
8 materials;
- 9 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and  
10 accompanying materials;
- 11 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 12 • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 13 • The European Commission Report on the CRT Conspiracy;
- 14 • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First  
15 Set of Interrogatories, No. 5 (February 10, 2012);
- 16 • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to  
17 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,  
18 2013);
- 19 • Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser  
20 Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- 21 • Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct  
22 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);
- 23 • Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser  
24 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- 25 • Koninklijke Philips Electronics N.V. and Philips Electronics North America  
26 Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of  
27 Interrogatories Nos. 4 and 5 (July 18, 2012);

- 1       • Koninklijke Philips Electronics N.V.’s Responses to Direct Action Plaintiffs’ First Set  
2           of Interrogatories (July 10, 2014);  
3       • LG Electronics, Inc.’s Supplemental Responses to Direct Purchaser Plaintiffs’ First  
4           Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);  
5       • LG Electronics, Inc.’s Second Supplemental Responses to Direct Purchaser Plaintiffs’  
6           First Set of Interrogatories, Interrogatories Nos. 4 and 5;  
7       • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and  
8           Panasonic Corporation’s (f/k/a Matsushita Electric Industrial Co., Ltd.) Second  
9           Supplemental Responses and Objections to Direct Purchaser Plaintiffs’ First Set of  
10          Interrogatories (November 2, 2011);  
11       • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and  
12           Panasonic Corporation’s (f/k/a Matsushita Electric Industrial Co., Ltd.) Third  
13           Supplemental Responses and Objections to Direct Purchaser Plaintiffs’ First Set of  
14          Interrogatories (December 23, 2011);  
15       • Philips’ Supplemental Responses to Direct Purchaser Plaintiffs’ First Set of  
16           Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);  
17       • Philips’ Second Supplemental Responses to Direct Purchaser Plaintiffs’ First Set of  
18           Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);  
19       • Philips Electronics North America Corporation’s Responses to Direct Action  
20           Plaintiffs’ First Set of Interrogatories (July 10, 2014);  
21       • Samsung SDI Defendants’ Responses to Direct Action Plaintiffs’ First Set of  
22           Interrogatories (May 12, 2010);  
23       • Samsung SDI Defendants’ Supplemental Responses to Direct Purchaser Plaintiffs’  
24           First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);  
25       • Samsung SDI Defendants’ Second Supplemental Responses to Direct Purchaser  
26           Plaintiffs’ First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);  
27       • Samsung SDI Co., Ltd.’s Responses to Dell Plaintiffs’ First Set of Interrogatories  
28           (November 25, 2013);

- 1       • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
- 2              Admission (November 25, 2013);
- 3       • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
- 4              Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
- 5              Interrogatories (February 10, 2012);
- 6       • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
- 7              4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- 8       • Sharp's Responses to Thomson SA and Thomson Consumer's First Set of
- 9              Interrogatories, Nos. 2 & 8 (July 10, 2014);
- 10      • Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG
- 11              Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to
- 12              those Responses (July 28, 2014);
- 13      • Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of
- 14              Interrogatories to Sharp (August 4, 2014);
- 15      • Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4,
- 16              2014);
- 17      • Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of
- 18              Interrogatories to Sharp (August 4, 2014);
- 19      • Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August
- 20              4, 2014); and
- 21      • Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp
- 22              (August 4, 2014).

23      **Request No. 12:**

24              Separately Identify each meeting or communication with a competitor or competitors,  
25              including the Royal Philips employee(s) associated with each meeting or communication, in  
26              which you contend Royal Philips participated between 1996 and 2007, as alleged in paragraph  
27              194 of the Complaint.

1        **Response to Request No. 12:**

2            Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp  
3 also objects to this Interrogatory to the extent that it calls for information that is already in the  
4 possession, custody, or control of Defendant, or that can equally or more readily, conveniently,  
5 and in a less burdensome fashion be obtained by Defendant. Sharp further objects to this  
6 Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on  
7 Sharp to state its entire case on an incomplete record and review and analyze all information  
8 obtained in discovery thus far at this stage of this litigation. Sharp objects that this Interrogatory  
9 improperly requires Sharp to marshal all evidence in support of its case, including all testimony,  
10 in responses to written discovery, but particularly while discovery is ongoing and in advance of  
11 the applicable deadlines set by the Court for disclosure of pretrial information. Sharp further  
12 objects to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly  
13 burdensome, and oppressive, and on the grounds that it is cumulative and duplicative of other  
14 discovery propounded in this case, and is therefore in violation of the Special Master's Order  
15 Regarding Individual Action Plaintiffs and Case Management (MDL Dkt. No. 1727, May 3,  
16 2010). Sharp additionally objects to the Interrogatory as requiring the attribution of a particular  
17 action to a specific Philips entity when all of the Philips entities named as defendants were owned  
18 and controlled and acted pursuant to the overall strategy and direction of KPNV. Sharp also  
19 objects to this Interrogatory on the grounds that it seeks, in contravention to well-established legal  
20 principles, to dismember the overall conspiracy to focus on its separate parts, instead of looking at  
21 it as a whole. *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699  
22 (1962); *Beltz Travel Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir.  
23 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly  
24 liable for the acts of their co-conspirators and the action of any of the conspirators in furtherance  
25 of the conspiracy is, in law, the action of all. *Id.* Sharp further objects to the extent this request  
26 calls for expert testimony. Sharp also objects to the extent that this request calls for information  
27 that is covered by attorney-client privilege or the work product protection. Sharp further states  
28 that it has not completed its discovery and preparation in this matter and that its investigation of

1 the case is ongoing, and Sharp reserves its right to supplement or amend its response to this  
2 Interrogatory consistent with Federal Rule of Civil Procedure 26(e).

3 Subject to and without waiving the foregoing objections, Sharp states that the response to  
4 this Interrogatory may include the transactional data and documents produced by defendants, co-  
5 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents  
6 responsive to this Interrogatory from review of the documents and data identified in this response  
7 is substantially the same for either Sharp or KPNV. Sharp further states that information  
8 responsive to this Interrogatory is contained in the following, which are incorporated here by  
9 reference:

- 10 • Exhibit A to these Responses;
- 11 • Attachment A to these Responses;
- 12 • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying  
13 materials;
- 14 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying  
15 materials;
- 16 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and  
17 accompanying materials;
- 18 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 19 • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 20 • The European Commission Report on the CRT Conspiracy;
- 21 • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First  
22 Set of Interrogatories, No. 5 (February 10, 2012);
- 23 • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to  
24 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,  
25 2013);
- 26 • Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser  
27 Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);

- 1       • Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct  
2              Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);  
3       • Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser  
4              Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);  
5       • Koninklijke Philips Electronics N.V. and Philips Electronics North America  
6              Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of  
7              Interrogatories Nos. 4 and 5 (July 18, 2012);  
8       • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set  
9              of Interrogatories (July 10, 2014);  
10      • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First  
11              Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);  
12      • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'  
13              First Set of Interrogatories, Interrogatories Nos. 4 and 5;  
14      • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and  
15              Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second  
16              Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of  
17              Interrogatories (November 2, 2011);  
18      • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and  
19              Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third  
20              Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of  
21              Interrogatories (December 23, 2011);  
22      • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of  
23              Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);  
24      • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of  
25              Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);  
26      • Philips Electronics North America Corporation's Responses to Direct Action  
27              Plaintiffs' First Set of Interrogatories (July 10, 2014);  
28

- Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of Interrogatories (May 12, 2010);
- Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories (November 25, 2013);
- Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for Admission (November 25, 2013);
- Toshiba America Electronic Components, Inc.'s Supplemental Objections and Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- Sharp's Responses to Thomson SA and Thomson Consumer's First Set of Interrogatories, Nos. 2 & 8 (July 10, 2014);
- Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to those Responses (July 28, 2014);
- Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014); and

- Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014).

**Request No. 13:**

Separately Identify each meeting or communication with a competitor or competitors, including the Philips America employee(s) associated with each meeting or communication, in which you contend Philips America participated between 1996 and 2007, as alleged in paragraph 194 of the Complaint.

## **Response to Request No. 13:**

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp also objects to this Interrogatory to the extent that it calls for information that is already in the possession, custody, or control of Defendant, or that can equally or more readily, conveniently, and in a less burdensome fashion be obtained by Defendant. Sharp further objects to this Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on Sharp to state its entire case on an incomplete record and review and analyze all information obtained in discovery thus far at this stage of this litigation. Sharp objects that this Interrogatory improperly requires Sharp to marshal all evidence in support of its case, including all testimony, in responses to written discovery, but particularly while discovery is ongoing and in advance of the applicable deadlines set by the Court for disclosure of pretrial information. Sharp further objects to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly burdensome, and oppressive, and on the grounds that it is cumulative and duplicative of other discovery propounded in this case, and is therefore in violation of the Special Master's Order Regarding Individual Action Plaintiffs and Case Management (MDL Dkt. No. 1727, May 3, 2010). Sharp additionally objects to the Interrogatory as requiring the attribution of a particular action to a specific Philips entity when all of the Philips entities named as defendants were owned and controlled and acted pursuant to the overall strategy and direction of KPNV. Sharp also objects to this Interrogatory on the grounds that it seeks, in contravention to well-established legal principles, to dismember the overall conspiracy to focus on its separate parts, instead of looking at it as a whole. *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir.

1 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly  
2 liable for the acts of their co-conspirators and the action of any of the conspirators in furtherance  
3 of the conspiracy is, in law, the action of all. *Id.* Sharp further objects to the extent this request  
4 calls for expert testimony. Sharp also objects to the extent that this request calls for information  
5 that is covered by attorney-client privilege or the work product protection. Sharp further states  
6 that it has not completed its discovery and preparation in this matter and that its investigation of  
7 the case is ongoing, and Sharp reserves its right to supplement or amend its response to this  
8 Interrogatory consistent with Federal Rule of Civil Procedure 26(e).

9 Subject to and without waiving the foregoing objections, Sharp states that the response to  
10 this Interrogatory may include the transactional data and documents produced by defendants, co-  
11 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents  
12 responsive to this Interrogatory from review of the documents and data identified in this response  
13 is substantially the same for either Sharp or KPNV. Sharp further states that information  
14 responsive to this Interrogatory is contained in the following, which are incorporated here by  
15 reference:

- 16 • Exhibit A to these Responses;
- 17 • Attachment A to these Responses;
- 18 • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying  
19 materials;
- 20 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying  
21 materials;
- 22 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and  
23 accompanying materials;
- 24 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 25 • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 26 • The European Commission Report on the CRT Conspiracy;
- 27 • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First  
28 Set of Interrogatories, No. 5 (February 10, 2012);

- 1       • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to  
2              Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,  
3              2013);  
4       • Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser  
5              Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);  
6       • Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct  
7              Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);  
8       • Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser  
9              Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);  
10      • Koninklijke Philips Electronics N.V. and Philips Electronics North America  
11              Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of  
12              Interrogatories Nos. 4 and 5 (July 18, 2012);  
13      • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set  
14              of Interrogatories (July 10, 2014);  
15      • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First  
16              Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);  
17      • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'  
18              First Set of Interrogatories, Interrogatories Nos. 4 and 5;  
19      • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and  
20              Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second  
21              Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of  
22              Interrogatories (November 2, 2011);  
23      • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and  
24              Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third  
25              Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of  
26              Interrogatories (December 23, 2011);  
27      • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of  
28              Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);

- 1     • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of  
2         Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);  
3     • Philips Electronics North America Corporation's Responses to Direct Action  
4         Plaintiffs' First Set of Interrogatories (July 10, 2014);  
5     • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of  
6         Interrogatories (May 12, 2010);  
7     • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'  
8         First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);  
9     • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser  
10         Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);  
11     • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories  
12         (November 25, 2013);  
13     • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for  
14         Admission (November 25, 2013);  
15     • Toshiba America Electronic Components, Inc.'s Supplemental Objections and  
16         Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of  
17         Interrogatories (February 10, 2012);  
18     • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.  
19         4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);  
20     • Sharp's Responses to Thomson SA and Thomson Consumer's First Set of  
21         Interrogatories, Nos. 2 & 8 (July 10, 2014);  
22     • Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG  
23         Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to  
24         those Responses (July 28, 2014);  
25     • Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of  
26         Interrogatories to Sharp (August 4, 2014);  
27     • Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4,  
28         2014);

- 1 • Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of
- 2 Interrogatories to Sharp (August 4, 2014);
- 3 • Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August
- 4 4, 2014); and
- 5 • Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp
- 6 (August 4, 2014).

7 **Request No. 14:**

8 Separately for each meeting or competitor communication that You Identified in response  
9 to Interrogatory Nos. 12 and 13, Identify All evidence upon which You intend to rely to prove  
10 that such a meeting or competitor communication resulted in an agreement to establish "target  
11 prices, 'bottom' prices, prices ranges, and price guidelines" for CRTs, as alleged in paragraph  
12 176(i) of the Complaint, including:

- 13 a) All Persons with knowledge suggesting that an agreement to fix target prices, floor  
14 prices and prices ranges for CRTs was reached;
- 15 b) The date of each meeting or competitor communication which You contend  
16 resulted in an agreement to fix target prices, floor prices and prices ranges for  
17 CRTs;
- 18 c) The location of each alleged meeting, if applicable;
- 19 d) The entities that you contend agreed to the target price, floor price or price range;
- 20 e) The names of the individuals that You contend participated in each meeting or  
21 competitor communication;
- 22 f) The date of the agreement;
- 23 g) The type (i.e., CDT or CPT) and model (flat, curved, ITC, bare) of CRT to which  
24 the target price, floor price or price range applied;
- 25 h) The effective date(s) of the target price, floor price or price range;
- 26 i) The customer(s) to whom the target price, floor price or price range applied;
- 27 j) The geographic area to which the target price, floor price or price range applied;  
28 and
- 29 k) All evidence upon which You intend to rely to prove such target price, floor price  
30 or price range (including the Bates number of each Document and/or citation to  
31 specific deposition testimony that You claim supports Your contention).

32 **Response to Request No. 14:**

33 Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp  
34 also objects to this Interrogatory to the extent that it calls for information that is already in the

1 possession, custody, or control of Defendants, or that can equally or more readily, conveniently,  
2 and in a less burdensome fashion be obtained by Defendants. Sharp further objects to this  
3 Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on  
4 Sharp to state its entire case on an incomplete record and review and analyze all information  
5 obtained in discovery thus far at this stage of this litigation. Sharp objects that this Interrogatory  
6 improperly requires Sharp to marshal all evidence in support of its case, including all testimony,  
7 in responses to written discovery, but particularly while discovery is ongoing and in advance of  
8 the applicable deadlines set by the Court for disclosure of pretrial information. Sharp further  
9 objects to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly  
10 burdensome, and oppressive, and on the grounds that it is cumulative and duplicative of other  
11 discovery propounded in this case, and is therefore in violation of the Special Master's Order  
12 Regarding Individual Action Plaintiffs and Case Management (MDL Dkt. No. 1727, May 3,  
13 2010). Sharp objects to the Interrogatory on the grounds that it violates the Special Master's  
14 Report and Recommendation on the Defendants' Motion to Compel, dated August 18, 2014.  
15 Sharp additionally objects to the Interrogatory as requiring the attribution of a particular action to  
16 a specific Philips entity when all of the Philips entities named as defendants were owned and  
17 controlled and acted pursuant to the overall strategy and direction of KPNV. Sharp also objects to  
18 this Interrogatory on the grounds that it seeks, in contravention to well-established legal  
19 principles, to dismember the overall conspiracy to focus on its separate parts, instead of looking at  
20 it as a whole. *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699  
21 (1962); *Beltz Travel Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir.  
22 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly  
23 liable for the acts of their co-conspirators and the action of any of the conspirators in furtherance  
24 of the conspiracy is, in law, the action of all. *Id.* Sharp further objects to the extent this request  
25 calls for expert testimony. Sharp also objects to the extent that this request calls for information  
26 that is covered by attorney-client privilege or the work product protection. Sharp also objects that  
27 this is a compound interrogatory consisting of eleven distinct subparts, each of which is a separate  
28 interrogatory, and therefore is overbroad and unduly burdensome. Sharp further states that it has

1 not completed its discovery and preparation in this matter and that its investigation of the case is  
2 ongoing, and Sharp reserves its right to supplement or amend its response to this Request  
3 consistent with Federal Rule of Civil Procedure 26(e).

4 Subject to and without waiving the foregoing objections, Sharp states that the response to  
5 this Interrogatory may include the transactional data and documents produced by defendants, co-  
6 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents  
7 responsive to this Interrogatory from review of the documents and data identified in this response  
8 is substantially the same for either Sharp or KPNV. Sharp further states that information  
9 responsive to this Interrogatory is contained in the following, which are incorporated here by  
10 reference:

- 11 • Exhibit A to these Responses;
- 12 • Attachment A to these Responses;
- 13 • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying  
14 materials;
- 15 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying  
16 materials;
- 17 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and  
18 accompanying materials;
- 19 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 20 • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 21 • The European Commission Report on the CRT Conspiracy;
- 22 • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First  
23 Set of Interrogatories, No. 5 (February 10, 2012);
- 24 • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to  
25 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,  
26 2013);
- 27 • Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser  
28 Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);

- 1       • Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct  
2              Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);  
3       • Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser  
4              Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);  
5       • Koninklijke Philips Electronics N.V. and Philips Electronics North America  
6              Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of  
7              Interrogatories Nos. 4 and 5 (July 18, 2012);  
8       • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set  
9              of Interrogatories (July 10, 2014);  
10      • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First  
11              Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);  
12      • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'  
13              First Set of Interrogatories, Interrogatories Nos. 4 and 5;  
14      • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and  
15              Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second  
16              Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of  
17              Interrogatories (November 2, 2011);  
18      • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and  
19              Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third  
20              Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of  
21              Interrogatories (December 23, 2011);  
22      • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of  
23              Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);  
24      • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of  
25              Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);  
26      • Philips Electronics North America Corporation's Responses to Direct Action  
27              Plaintiffs' First Set of Interrogatories (July 10, 2014);  
28

- Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of Interrogatories (May 12, 2010);
- Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories (November 25, 2013);
- Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for Admission (November 25, 2013);
- Toshiba America Electronic Components, Inc.'s Supplemental Objections and Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- Sharp's Responses to Thomson SA and Thomson Consumer's First Set of Interrogatories, Nos. 2 & 8 (July 10, 2014);
- Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to those Responses (July 28, 2014);
- Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014); and

- Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014).

### **Request No. 15:**

Separately for each meeting or competitor communication that You Identified in response to Interrogatory Nos. 12 and 13, Identify all Evidence upon which You intend to rely to prove that such a meeting or competitor communication resulted in an agreement to maintain or lower production capacity for CRTs, as alleged in paragraph 253(g) of the Complaint, including:

- a) All persons with knowledge suggesting that an agreement to maintain or lower production capacity for CRTs was reached;
- b) The date of each meeting or competitor communication which You contend resulted in an agreement to maintain or lower production capacity for CRTs;
- c) The location of each alleged meeting, if applicable;
- d) The entities who you contend agreed to maintain or lower production capacity for CRTs;
- e) The names of the individuals that You contend participated in each meeting or competitor communication;
- f) The date of the agreement;
- g) The type (i.e., CDT or CPT) and model (flat, curved, ITC, bare) of CRT to which the agreement applied;
- h) The effective date(s) of the agreement to maintain or lower production capacity for CRTs;
- i) The geographic area to which the agreement to maintain or lower production capacity for CRTs applied; and
- j) All evidence upon which You intend to rely to prove that an agreement to maintain or lower production capacity for CRTs was reached (including the Bates number of each Document and/or citation to specific deposition testimony that You claim supports Your contention).

## **Response to Request No. 15:**

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp also objects to this Interrogatory to the extent that it calls for information that is already in the possession, custody, or control of Defendants, or that can equally or more readily, conveniently, and in a less burdensome fashion be obtained by Defendants. Sharp further objects to this Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on Sharp to state its entire case on an incomplete record and review and analyze all information

1 obtained in discovery thus far at this stage of this litigation. Sharp objects that this Interrogatory  
2 improperly requires Sharp to marshal all evidence in support of its case, including all testimony,  
3 in responses to written discovery, but particularly while discovery is ongoing and in advance of  
4 the applicable deadlines set by the Court for disclosure of pretrial information. Sharp further  
5 objects to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly  
6 burdensome, and oppressive, and on the grounds that it is cumulative and duplicative of other  
7 discovery propounded in this case, and is therefore in violation of the Special Master's Order  
8 Regarding Individual Action Plaintiffs and Case Management (MDL Dkt. No. 1727, May 3,  
9 2010). Sharp objects to the Interrogatory on the grounds that it violates the Special Master's  
10 Report and Recommendation on the Defendants' Motion to Compel, dated August 18, 2014.  
11 Sharp additionally objects to the Interrogatory as requiring the attribution of a particular action to  
12 a specific Philips entity when all of the Philips entities named as defendants were owned and  
13 controlled and acted pursuant to the overall strategy and direction of KPNV. Sharp also objects to  
14 this Interrogatory on the grounds that it seeks, in contravention to well-established legal  
15 principles, to dismember the overall conspiracy to focus on its separate parts, instead of looking at  
16 it as a whole. *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699  
17 (1962); *Beltz Travel Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir.  
18 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly  
19 liable for the acts of their co-conspirators and the action of any of the conspirators in furtherance  
20 of the conspiracy is, in law, the action of all. *Id.* Sharp further objects to the extent this request  
21 calls for expert testimony. Sharp also objects to the extent that this request calls for information  
22 that is covered by attorney-client privilege or the work product protection. Sharp also objects that  
23 this is a compound interrogatory consisting of ten distinct subparts, each of which is a separate  
24 interrogatory, and therefore is overbroad and unduly burdensome. Sharp further states that it has  
25 not completed its discovery and preparation in this matter and that its investigation of the case is  
26 ongoing, and Sharp reserves its right to supplement or amend its response to this Request  
27 consistent with Federal Rule of Civil Procedure 26(e).

28

1           Subject to and without waiving the foregoing objections, Sharp states that the response to  
2 this Interrogatory may include the transactional data and documents produced by defendants, co-  
3 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents  
4 responsive to this Interrogatory from review of the documents and data identified in this response  
5 is substantially the same for either Sharp or KPNV. Sharp further states that information  
6 responsive to this Interrogatory is contained in the following, which are incorporated here by  
7 reference:

- 8           • Exhibit A to these Responses;
- 9           • Attachment A to these Responses;
- 10          • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying  
11 materials;
- 12          • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying  
13 materials;
- 14          • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and  
15 accompanying materials;
- 16          • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 17          • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 18          • The European Commission Report on the CRT Conspiracy;
- 19          • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First  
20 Set of Interrogatories, No. 5 (February 10, 2012);
- 21          • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to  
22 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,  
23 2013);
- 24          • Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser  
25 Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- 26          • Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct  
27 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);

- 1       • Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser  
2              Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);  
3       • Koninklijke Philips Electronics N.V. and Philips Electronics North America  
4              Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of  
5              Interrogatories Nos. 4 and 5 (July 18, 2012);  
6       • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set  
7              of Interrogatories (July 10, 2014);  
8       • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First  
9              Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);  
10      • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'  
11              First Set of Interrogatories, Interrogatories Nos. 4 and 5;  
12      • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and  
13              Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second  
14              Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of  
15              Interrogatories (November 2, 2011);  
16      • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and  
17              Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third  
18              Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of  
19              Interrogatories (December 23, 2011);  
20      • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of  
21              Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);  
22      • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of  
23              Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);  
24      • Philips Electronics North America Corporation's Responses to Direct Action  
25              Plaintiffs' First Set of Interrogatories (July 10, 2014);  
26      • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of  
27              Interrogatories (May 12, 2010);  
28

- 1       • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);  
2
- 3       • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);  
4
- 5       • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories (November 25, 2013);  
6
- 7       • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for Admission (November 25, 2013);  
8
- 9       • Toshiba America Electronic Components, Inc.'s Supplemental Objections and Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);  
10
- 11      • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);  
12
- 13      • Sharp's Responses to Thomson SA and Thomson Consumer's First Set of Interrogatories, Nos. 2 & 8 (July 10, 2014);  
14
- 15      • Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to those Responses (July 28, 2014);  
16
- 17      • Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of Interrogatories to Sharp (August 4, 2014);  
18
- 19      • Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014);  
20
- 21      • Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of Interrogatories to Sharp (August 4, 2014);  
22
- 23      • Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014); and  
24
- 25      • Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014).  
26
- 27
- 28

1      **Request No. 16:**

2            Separately for each meeting or competitor communication that You Identified in response  
3            to Interrogatory Nos. 12 and 13, Identify all Evidence upon which You intend to rely to prove that  
4            such a meeting or competitor communication resulted in an agreement to allocate either overall  
5            market shares or share of a particular customer's purchases, as alleged in paragraph 176(viii) of  
6            the Complaint, including:

7            a) All persons with knowledge suggesting that an agreement to allocate either overall  
8            market share or share of a particular customer's purchases;

9            b) The date of each meeting or competitor communication which You contend  
10          resulted in an agreement to allocate either overall market share or share of a  
11          particular customer's purchases;

12          c) The location of each alleged meeting, if applicable;

13          d) The entities who you contend agreed to allocate either overall market share or  
14          share of a particular customer's purchases;

15          e) The names of the individuals that You contend participated in each meeting or  
16          competitor communication;

17          f) The date of the agreement;

18          g) The type (i.e., CDT or CPT) and model (flat, curved, ITC, bare) of CRT to which  
19          the agreement applied;

20          h) The effective date(s) of the agreement to allocate either overall market share or  
21          share of a particular customer's purchases;

22          i) The geographic area to which the agreement to allocate either overall market share  
23          or share of a particular customer's purchases; and

24          j) All evidence upon which You intend to rely to prove that an agreement to allocate  
25          either overall market share or share of a particular customer's purchases was  
26          reached (including the Bates number of each Document and/or citation to specific  
27          deposition testimony that You claim supports Your contention).

28      **Response to Request No. 16:**

29            Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp  
30          also objects to this Interrogatory to the extent that it calls for information that is already in the  
31          possession, custody, or control of Defendants, or that can equally or more readily, conveniently,  
32          and in a less burdensome fashion be obtained by Defendants. Sharp further objects to this  
33          Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on  
34          Sharp to state its entire case on an incomplete record and review and analyze all information  
35          obtained in discovery thus far at this stage of this litigation. Sharp objects that this Interrogatory

1       improperly requires Sharp to marshal all evidence in support of its case, including all testimony,  
2       in responses to written discovery, but particularly while discovery is ongoing and in advance of  
3       the applicable deadlines set by the Court for disclosure of pretrial information. Sharp further  
4       objects to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly  
5       burdensome, and oppressive, and on the grounds that it is cumulative and duplicative of other  
6       discovery propounded in this case, and is therefore in violation of the Special Master's Order  
7       Regarding Individual Action Plaintiffs and Case Management (MDL Dkt. No. 1727, May 3,  
8       2010). Sharp objects to the Interrogatory on the grounds that it violates the Special Master's  
9       Report and Recommendation on the Defendants' Motion to Compel, dated August 18, 2014.  
10      Sharp additionally objects to the Interrogatory as requiring the attribution of a particular action to  
11      a specific Philips entity when all of the Philips entities named as defendants were owned and  
12      controlled and acted pursuant to the overall strategy and direction of KPNV. Sharp also objects to  
13      this Interrogatory on the grounds that it seeks, in contravention to well-established legal  
14      principles, to dismember the overall conspiracy to focus on its separate parts, instead of looking at  
15      it as a whole. *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699  
16      (1962); *Beltz Travel Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir.  
17      1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly  
18      liable for the acts of their co-conspirators and the action of any of the conspirators in furtherance  
19      of the conspiracy is, in law, the action of all. *Id.* Sharp further objects to the extent this request  
20      calls for expert testimony. Sharp also objects to the extent that this request calls for information  
21      that is covered by attorney-client privilege or the work product protection. Sharp also objects that  
22      this is a compound interrogatory consisting of ten distinct subparts, each of which is a separate  
23      interrogatory, and therefore is overbroad and unduly burdensome. Sharp further states that it has  
24      not completed its discovery and preparation in this matter and that its investigation of the case is  
25      ongoing, and Sharp reserves its right to supplement or amend its response to this Request  
26      consistent with Federal Rule of Civil Procedure 26(e).

27

28

1           Subject to and without waiving the foregoing objections, Sharp states that the response to  
2 this Interrogatory may include the transactional data and documents produced by defendants, co-  
3 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents  
4 responsive to this Interrogatory from review of the documents and data identified in this response  
5 is substantially the same for either Sharp or KPNV. Sharp further states that information  
6 responsive to this Interrogatory is contained in the following, which are incorporated here by  
7 reference:

- 8           • Exhibit A to these Responses;
- 9           • Attachment A to these Responses;
- 10          • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying  
11 materials;
- 12          • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying  
13 materials;
- 14          • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and  
15 accompanying materials;
- 16          • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 17          • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 18          • The European Commission Report on the CRT Conspiracy;
- 19          • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First  
20 Set of Interrogatories, No. 5 (February 10, 2012);
- 21          • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to  
22 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,  
23 2013);
- 24          • Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser  
25 Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- 26          • Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct  
27 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);

- 1       • Koninklijke Philips Electronics N.V.’s Responses and Objections to Direct Purchaser
- 2              Plaintiffs’ First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- 3       • Koninklijke Philips Electronics N.V. and Philips Electronics North America
- 4              Corporation Responses and Objections to Direct Purchaser Plaintiffs’ First Set of
- 5              Interrogatories Nos. 4 and 5 (July 18, 2012);
- 6       • Koninklijke Philips Electronics N.V.’s Responses to Direct Action Plaintiffs’ First Set
- 7              of Interrogatories (July 10, 2014);
- 8       • LG Electronics, Inc.’s Supplemental Responses to Direct Purchaser Plaintiffs’ First
- 9              Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);
- 10      • LG Electronics, Inc.’s Second Supplemental Responses to Direct Purchaser Plaintiffs’
- 11              First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 12      • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
- 13              Panasonic Corporation’s (f/k/a Matsushita Electric Industrial Co., Ltd.) Second
- 14              Supplemental Responses and Objections to Direct Purchaser Plaintiffs’ First Set of
- 15              Interrogatories (November 2, 2011);
- 16      • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
- 17              Panasonic Corporation’s (f/k/a Matsushita Electric Industrial Co., Ltd.) Third
- 18              Supplemental Responses and Objections to Direct Purchaser Plaintiffs’ First Set of
- 19              Interrogatories (December 23, 2011);
- 20      • Philips’ Supplemental Responses to Direct Purchaser Plaintiffs’ First Set of
- 21              Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);
- 22      • Philips’ Second Supplemental Responses to Direct Purchaser Plaintiffs’ First Set of
- 23              Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 24      • Philips Electronics North America Corporation’s Responses to Direct Action
- 25              Plaintiffs’ First Set of Interrogatories (July 10, 2014);
- 26      • Samsung SDI Defendants’ Responses to Direct Action Plaintiffs’ First Set of
- 27              Interrogatories (May 12, 2010);

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- 1       • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);  
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- 3       • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);  
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- 5       • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories (November 25, 2013);  
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- 7       • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for Admission (November 25, 2013);  
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- 9       • Toshiba America Electronic Components, Inc.'s Supplemental Objections and Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);  
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- 11      • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);  
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- 13      • Sharp's Responses to Thomson SA and Thomson Consumer's First Set of Interrogatories, Nos. 2 & 8 (July 10, 2014);  
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- 15      • Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to those Responses (July 28, 2014);  
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- 17      • Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of Interrogatories to Sharp (August 4, 2014);  
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- 19      • Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014);  
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- 21      • Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of Interrogatories to Sharp (August 4, 2014);  
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- 23      • Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014); and  
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- 25      • Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014).  
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1      **Request No. 17:**

2            Separately for each meeting or competitor communication that You Identified in response  
3            to Interrogatory Nos. 12 and 13, Identify all Evidence upon which You intend to rely to prove that  
4            such a meeting or competitor communication resulted in an agreement to allocate customers, as  
5            alleged in paragraph 176(ix) of the Complaint, including:

- 6            a) All persons with knowledge suggesting that an agreement to allocate customers;
- 7            b) The date of each meeting or competitor communication which You contend  
8            resulted in an agreement to allocate customers;
- 9            c) The location of each alleged meeting, if applicable;
- 10          d) The entities who you contend agreed to allocate customers;
- 11          e) The names of the individuals that You contend participated in each meeting or  
12           competitor communication;
- 13          f) The date of the agreement;
- 14          g) The type (i.e., CDT or CPT) and model (flat, curved, ITC, bare) of CRT to which  
15           the agreement applied;
- 16          h) The effective date(s) of the agreement to allocate customers;
- 17          i) The geographic area to which the agreement to allocate customers; and
- 18          j) All evidence upon which You intend to rely to prove that an agreement to allocate  
19           customers was reached (including the Bates number of each Document and/or  
20           citation to specific deposition testimony that You claim supports Your contention).

21      **Response to Request No. 17:**

22            Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp  
23           also objects to this Interrogatory to the extent that it calls for information that is already in the  
24           possession, custody, or control of Defendants, or that can equally or more readily, conveniently,  
25           and in a less burdensome fashion be obtained by Defendants. Sharp further objects to this  
26           Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on  
27           Sharp to state its entire case on an incomplete record and review and analyze all information  
28           obtained in discovery thus far at this stage of this litigation. Sharp objects that this Interrogatory  
              improperly requires Sharp to marshal all evidence in support of its case, including all testimony,  
              in responses to written discovery, but particularly while discovery is ongoing and in advance of  
              the applicable deadlines set by the Court for disclosure of pretrial information. Sharp further  
              objects to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly

1 burdensome, and oppressive, and on the grounds that it is cumulative and duplicative of other  
2 discovery propounded in this case, and is therefore in violation of the Special Master's Order  
3 Regarding Individual Action Plaintiffs and Case Management (MDL Dkt. No. 1727, May 3,  
4 2010). Sharp objects to the Interrogatory on the grounds that it violates the Special Master's  
5 Report and Recommendation on the Defendants' Motion to Compel, dated August 18, 2014.  
6 Sharp additionally objects to the Interrogatory as requiring the attribution of a particular action to  
7 a specific Philips entity when all of the Philips entities named as defendants were owned and  
8 controlled and acted pursuant to the overall strategy and direction of KPNV. Sharp also objects to  
9 this Interrogatory on the grounds that it seeks, in contravention to well-established legal  
10 principles, to dismember the overall conspiracy to focus on its separate parts, instead of looking at  
11 it as a whole. *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699  
12 (1962); *Beltz Travel Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir.  
13 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly  
14 liable for the acts of their co-conspirators and the action of any of the conspirators in furtherance  
15 of the conspiracy is, in law, the action of all. *Id.* Sharp further objects to the extent this request  
16 calls for expert testimony. Sharp also objects to the extent that this request calls for information  
17 that is covered by attorney-client privilege or the work product protection. Sharp also objects that  
18 this is a compound interrogatory consisting of ten distinct subparts, each of which is a separate  
19 interrogatory, and therefore is overbroad and unduly burdensome. Sharp further states that it has  
20 not completed its discovery and preparation in this matter and that its investigation of the case is  
21 ongoing, and Sharp reserves its right to supplement or amend its response to this Request  
22 consistent with Federal Rule of Civil Procedure 26(e).

23 Subject to and without waiving the foregoing objections, Sharp states that the response to  
24 this Interrogatory may include the transactional data and documents produced by defendants, co-  
25 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents  
26 responsive to this Interrogatory from review of the documents and data identified in this response  
27 is substantially the same for either Sharp or KPNV. Sharp further states that information  
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1 responsive to this Interrogatory is contained in the following, which are incorporated here by  
2 reference:

- 3 • Exhibit A to these Responses;
- 4 • Attachment A to these Responses;
- 5 • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying  
6 materials;
- 7 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying  
8 materials;
- 9 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and  
10 accompanying materials;
- 11 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 12 • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 13 • The European Commission Report on the CRT Conspiracy;
- 14 • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First  
15 Set of Interrogatories, No. 5 (February 10, 2012);
- 16 • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to  
17 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,  
18 2013);
- 19 • Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser  
20 Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- 21 • Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct  
22 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);
- 23 • Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser  
24 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- 25 • Koninklijke Philips Electronics N.V. and Philips Electronics North America  
26 Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of  
27 Interrogatories Nos. 4 and 5 (July 18, 2012);

- 1       • Koninklijke Philips Electronics N.V.’s Responses to Direct Action Plaintiffs’ First Set  
2           of Interrogatories (July 10, 2014);  
3       • LG Electronics, Inc.’s Supplemental Responses to Direct Purchaser Plaintiffs’ First  
4           Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);  
5       • LG Electronics, Inc.’s Second Supplemental Responses to Direct Purchaser Plaintiffs’  
6           First Set of Interrogatories, Interrogatories Nos. 4 and 5;  
7       • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and  
8           Panasonic Corporation’s (f/k/a Matsushita Electric Industrial Co., Ltd.) Second  
9           Supplemental Responses and Objections to Direct Purchaser Plaintiffs’ First Set of  
10          Interrogatories (November 2, 2011);  
11       • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and  
12           Panasonic Corporation’s (f/k/a Matsushita Electric Industrial Co., Ltd.) Third  
13           Supplemental Responses and Objections to Direct Purchaser Plaintiffs’ First Set of  
14          Interrogatories (December 23, 2011);  
15       • Philips’ Supplemental Responses to Direct Purchaser Plaintiffs’ First Set of  
16           Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);  
17       • Philips’ Second Supplemental Responses to Direct Purchaser Plaintiffs’ First Set of  
18           Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);  
19       • Philips Electronics North America Corporation’s Responses to Direct Action  
20           Plaintiffs’ First Set of Interrogatories (July 10, 2014);  
21       • Samsung SDI Defendants’ Responses to Direct Action Plaintiffs’ First Set of  
22           Interrogatories (May 12, 2010);  
23       • Samsung SDI Defendants’ Supplemental Responses to Direct Purchaser Plaintiffs’  
24           First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);  
25       • Samsung SDI Defendants’ Second Supplemental Responses to Direct Purchaser  
26           Plaintiffs’ First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);  
27       • Samsung SDI Co., Ltd.’s Responses to Dell Plaintiffs’ First Set of Interrogatories  
28           (November 25, 2013);

- 1       • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
- 2              Admission (November 25, 2013);
- 3       • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
- 4              Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
- 5              Interrogatories (February 10, 2012);
- 6       • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
- 7              4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- 8       • Sharp's Responses to Thomson SA and Thomson Consumer's First Set of
- 9              Interrogatories, Nos. 2 & 8 (July 10, 2014);
- 10      • Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG
- 11              Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to
- 12              those Responses (July 28, 2014);
- 13      • Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of
- 14              Interrogatories to Sharp (August 4, 2014);
- 15      • Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4,
- 16              2014);
- 17      • Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of
- 18              Interrogatories to Sharp (August 4, 2014);
- 19      • Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August
- 20              4, 2014); and
- 21      • Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp
- 22              (August 4, 2014).